

EXHIBIT R

Lee, Carol

From: Amiad Kushner <akushner@seidenlawgroup.com>
Sent: Monday, January 23, 2023 3:04 PM
To: Smith, Andrew C.; Xintong Zhang
Cc: Sant, Geoffrey; Lee, Carol
Subject: RE: Huzhou Chuangtai Rongyuan Investment Management Partnership et al v. Qin - Notice of Deposition

Andy,

Mr. Qin is available to be deposed at your office on Monday, January 30, 2023, starting at 11:00 am (Mr. Qin will be traveling from Long Island that morning, and thus cannot do 9:00 am). Please confirm whether the 11:00 am start time works. Please also confirm whether the deposition will be videotaped.

Just to confirm, Mr. Qin will need an interpreter to translate from Mandarin Chinese, as he does not speak English.

Finally, Mr. Qin objects to your deposition notice to the extent it purports to require him to submit to unspecified "further depositions" after the January 30, 2023 deposition. Absent Mr. Qin's agreement or a court order, Petitioners are entitled to a single deposition of Mr. Qin totaling up to seven hours. See FRCP 30(d)(1).

Regards,

Amiad

Amiad Kushner
Partner, Head of Litigation
Seiden Law Group LLP
322 Eighth Avenue, Suite 1704
New York, NY 10001
Office: (646) 766-1914
Mobile: (646) 275-2485
www.seidenlawgroup.com

From: Smith, Andrew C. <andrew.smith@pillsburylaw.com>
Sent: Thursday, January 19, 2023 8:32 PM
To: Amiad Kushner <akushner@seidenlawgroup.com>; Xintong Zhang <xzhang@seidenlawgroup.com>
Cc: Sant, Geoffrey <geoffrey.sant@pillsburylaw.com>; Lee, Carol <carol.lee@pillsburylaw.com>
Subject: Huzhou Chuangtai Rongyuan Investment Management Partnership et al v. Qin - Notice of Deposition

Dear Amiad,

Attached please find a deposition notice for Mr. Qin. While the deposition is noticed for January 30, 2023 at 9:00 am, we are amenable to finding a mutually agreeable date and time if that one does not work for you and Mr. Qin.

Sincerely,
Andy

Andrew C. Smith | Partner

Pillsbury Winthrop Shaw Pittman LLP
31 West 52nd Street | New York, NY 10019-6131
t +1.212.858.1743 | **f** +1.212.858.1500 | **m** +1.917.687.2099
andrew.smith@pillsburylaw.com | [website](#) [bio](#)

AUSTIN BEIJING HONG KONG HOUSTON LONDON LOS ANGELES
MIAMI NASHVILLE **NEW YORK** NORTHERN VIRGINIA PALM BEACH
SACRAMENTO SAN DIEGO SAN FRANCISCO SHANGHAI
SILICON VALLEY TAIPEI TOKYO WASHINGTON, DC



The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Service Desk at Tel: 800-477-0770, Option 1, immediately by telephone and delete this message, along with any attachments, from your computer. Nothing in this message may be construed as a digital or electronic signature of any employee of Pillsbury Winthrop Shaw Pittman. Thank you.